



THE CITY OF NEW YORK
LAW DEPARTMENT
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USDS SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #: _____
DATE FILED: <u>1/17/08</u>

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January 16, 2008

BY HAND DELIVERY

Honorable Victor Marrero
 United States District Judge
 Southern District of New York
 500 Pearl Street
 New York, NY 10007

Re: Chris Thomas, et. al. v. The City of New York, et. al., 07 CV 11508 (VM) (HBP)

Your Honor:

I am a Senior Counsel in the Special Federal Litigation Division of the New York City Law Department. I am writing to respectfully request a 60 day enlargement of time, from January 17, 2008 to March 17, 2008 to interpose an answer on behalf of the City of New York ("City"). This request for an extension is the City's first. Plaintiff's counsel has consented to this request.

There are several reasons for seeking an enlargement of time. In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need time to investigate the allegations of the complaint. In this case, plaintiffs allege that they were falsely arrested and that excessive force was used against them. Accordingly, it is necessary for defendant City of New York to acquire as much information as possible concerning this matter in order to properly assess the case and respond to the complaint. To that end, this office is in the process of forwarding to plaintiffs for execution N.Y.C.P.L. §160.50 releases so that we can access the sealed records from their underlying criminal prosecutions.

In view of the foregoing, it is respectfully requested that the City's time to answer or otherwise respond to the complaint be extended until March 17, 2008.

Thank you for your consideration in this regard.

Respectfully submitted,


Afsaan Saleem (AS 2012)
Senior Counsel
Special Federal Litigation Division

cc: Brett Klein, Esq.
Leventhal & Klein, LLP
45 Main Street, Suite 230
Brooklyn, NY 11201

Request GRANTED. The time for defendant(s) to answer or otherwise move with respect to the complaint in this action is extended to <u>3-17-08</u> .	
SO ORDERED.	
1-16-08	
DATE	VICTOR MARRERO, U.S.D.J.